

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

	x	
	x	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846 (SWR)
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
	:	

**STIPULATION FOR ENTRY OF AN ORDER
CONCERNING THE DEADLINE FOR OBJECTING CREDITORS TO SERVE COPIES
OF CERTAIN REBUTTAL EXPERT REPORTS**

NOW COMES the City of Detroit, Michigan; Syncora Capital Assurance Inc. and Syncora Guarantee Inc. (“Syncora”); Financial Guaranty Insurance Company (“FGIC”); and the Ad Hoc COPs-Holders (collectively, “Objecting Creditors”), by and through the undersigned counsel, and hereby stipulate to entry of an Order Concerning the Deadline for Objecting Creditors to Serve Copies of Certain Rebuttal Expert Reports in the form of Exhibit A hereto.

Whereas, the Court entered the Fifth Amended Order Establishing the Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (Docket No. 5259) (the “Fifth Amended Scheduling Order”) on June 9, 2014. The Fifth Amended Scheduling Order establishes certain dates for objecting creditors to file a list of expert witnesses and serve copies of rebuttal expert reports.

Whereas, the Objecting Creditors contacted the City on or about July 14, 2014, to discuss the availability of Alan Perry, the City’s pension expert, to be deposed. The Objectors suggested July 21, 2014. The City responded that Mr. Perry was unavailable on July 21, but was available on July 24 and July 25, 2014.

Whereas, the parties worked cooperatively to reach a resolution that both accommodated Mr. Perry's schedule while at the same time preserving the opportunity for Objecting Creditors' pension experts to consider Mr. Perry's testimony before finalizing their reports, the parties agreed as follows:

1. The deposition of Mr. Perry will take place on July 25, 2014.
2. The deadline for reports from the Objecting Creditors' experts that address pensions shall be extended to **July 29, 2014**. This extension pertains to one expert for Syncora and one expert for the Ad-Hoc COPs-Holders. FGIC will file an expert report that addresses pensions on **July 25, 2014** but may supplement that report by **July 29, 2014**.
3. The deadline for all other rebuttal expert reports and disclosure of expert witnesses remains July 25, 2014, in accordance with the Fifth Amended Scheduling Order.

Dated: July 24, 2014

Respectfully submitted,

/s/ Robert S. Hertzberg

Robert S. Hertzberg
PEPPER HAMILTON LLP
Suite 1800
4000 Town Center
Southfield, MI 48075-1505
Telephone: (248) 359-7333
Facsimile: (248) 359-7700
hertzbergr@pepperlaw.com
P30261

and

Geoffrey S. Stewart
JONES DAY
51 Louisiana Ave. N.W.
Washington, DC 20001-2113
Telephone: (202) 879-5445
Facsimile: (202) 626-1700
gstewart@jonesday.com
*Counsel to the City of Detroit,
Michigan*

/s/ Mark R. James

Ernest J. Essad Jr.

Mark R. James

WILLIAMS, WILLIAMS, RATTNER &
PLUNKETT, P.C.

280 North Old Woodward Avenue,
Suite 300

Birmingham, MI 48009

Telephone: (248) 642-0333

Facsimile: (248) 642-0856

Email: EJEssad@wwrplaw.com

Email: mrjames@wwrplaw.com

– and –

Alfredo R. Pérez

WEIL, GOTSHAL & MANGES LLP

700 Louisiana Street, Suite 1700

Houston, TX 77002

Telephone: (713) 546-5000

Facsimile: (713) 224-9511

Email: alfredo.perez@weil.com

*Attorneys for Financial Guaranty Insurance
Company*

By: /s/ Stephen C. Hackney

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

Stephen C. Hackney

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

- and -

Stephen M. Gross

David A. Agay

Joshua Gadharf

MCDONALD HOPKINS PLC

39533 Woodward Avenue

Bloomfield Hills, MI 48304

Telephone: (248) 646-5070

Facsimile: (248) 646-5075

*Attorneys for Syncora Guarantee Inc. and
Syncora Capital Assurance Inc.*

/s/ Deborah L. Fish

Deborah L Fish
ALLARD & FISH, P.C.
2600 Buhl Building
535 Griswold
Detroit, MI 48226
Telephone: 313/309-3171
dfish@allardfishpc.com
P36580

and

Thomas Moers Mayer
E-mail: tmayer@kramerlevin.com
Jonathan M. Wagner
E-mail: jwagner@kramerlevin.com
KRAMER LEVIN NAFTALIS &
FRANKEL LLP
1177 Avenue of the Americas
New York, NY 10036
Tel: 212/715-9169

Counsel for the Ad Hoc COPs-Holders

Exhibit A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

	X	
	X	
In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846 (SWR)
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
	X	

**ORDER CONCERNING THE DEADLINE FOR OBJECTING CREDITORS TO SERVE
COPIES OF CERTAIN REBUTTAL EXPERT REPORTS**

This matter having come to the Court upon the stipulation of the City of Detroit, Michigan; Syncora Capital Assurance Inc. and Syncora Guarantee Inc. (“Syncora”); Financial Guaranty Insurance Company; and the Ad Hoc COPs-Holders (collectively, “Objecting Creditors”); and the Court being otherwise duly advised in the premises;

NOW, THEREFORE, IT IS ORDERED that the deadline for Objecting Creditors to serve copies of rebuttal expert reports regarding pensions shall be extended to **July 29, 2014**. This Order pertains to one expert from Syncora and one expert from the Ad-Hoc COPs-Holders. FGIC will file an expert report that addresses pensions on **July 25, 2014** but may supplement that report by **July 29, 2014**. All other deadlines in the Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (Docket No. 5259) shall remain the same.